

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

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In re:

RED RIVER TALC, LLC,<sup>1</sup>

Debtor.

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)  
) Chapter 11  
)

) Case No. 24-90505  
)

) **Re: Docket Nos. 621, 622, 623,**  
) **624, 625, 626, 627, 628**

**DECLARATION OF SUNNI P. BEVILLE IN SUPPORT OF  
COALITION OF COUNSEL FOR JUSTICE FOR THE REPLIES FILED ON  
NOVEMBER 22, 2024**

I, Sunni P. Beville, pursuant to 28 U.S.C. § 1746, declare, under penalty of perjury, that the following is true and correct:

1. I am a Member of the firm of Otterbourg P.C., co-counsel to the Coalition of Counsel for Justice for Talc Claimants (the “Coalition”).

2. I submit this declaration in support of the: (a) *Omnibus Reply in Support of Motions of the Coalition of Counsel for Justice for Talc Claimants to (i) Establish a Bar Date, and (ii) Establish Estimation Procedures and Schedule Estimation Proceedings* [Dkt. Nos. 621-622]; (b) *and Reply in Support of Motion of the Coalition of Counsel for Justice for Talc Claimants to Dismiss the Chapter 11 Case Pursuant to 11 U.S.C. § 1112(b)* [Dkt. Nos. 623-624]; (c) *Omnibus Reply in Support of Motions of the Coalition of Counsel for Justice for Talc Claimants to (i) Designate Votes Pursuant to 11 U.S.C. § 1126(e), and (ii) Reinstate Votes Improperly Modified by the Smith Firm* [Dkt. Nos. 625-626]; and (d) *Reply in Support of Motion of the Coalition of*

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 8508. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

*Counsel for Justice for Talc Claimants to Vacate the Ex Parte Order Appointing Epiq Corporate Restructuring, LLC as Claims, Noticing and Solicitation Agent* [Dkt. No. 627-628] (collectively, the “Replies”).

3. Set forth below is a chart describing each of the true and correct copies of the attached exhibits, all of which are referred to in the Replies, are filed contemporaneously herewith.

Ex.	Description
1	Transcript from deposition of John Kim, Debtor 30(b)(6) witness, Case No. 24-90505 (Nov. 15, 2024) (filed under seal)
2	Transcript from deposition of Allen Smith, Jr., Case No. 24-90505 (Nov. 21, 2024) (filed under seal)
3	Transcript from deposition of Mikal Watts, Case No. 24-90505 (Nov. 12, 2024) (“ <u>Watts Deposition</u> ”) (filed under seal)
4	Transcript from deposition of Robert Wuesthoff, Case No. 24-90505 (Nov. 14, 2024) (filed under seal)
5	Transcript from deposition of Richard Dickinson, Case No. 24-90505 (Nov. 19, 2024) (filed under seal)
6	Transcript excerpt from the deposition of Cheryl Saenz, MD, <i>In re: Johnson &amp; Johnson Talcum Powder Prods. Marketing, Sales Practices, &amp; Prod. Liab. Litig.</i> , MDL 2738 (June 19, 2024) (filed under seal)
7	Transcript from deposition of Stephenie Kjontvedt, Epiq 30(b)(6) witness, Case No. 24-90505 (Nov. 15, 2024) (the “ <u>Epiq Deposition</u> ”) (filed under seal)
8	Emails between Jones Day and Epiq (7/26/24-8/9/24) [Exhibit 8 of the Epiq Deposition] (filed under seal)
9	Emails between Jones Day and Epiq on 7/26/24 [Exhibit 10 of the Epiq Deposition] (filed under seal)
10	Email from Beasley Allen to Epiq, dated 9/19/24 [Exhibit 13 of the Epiq Deposition]
11	Cover email dated 8/29/24, attaching letter dated 8/28/24 from Beasley Allen to Epiq [Exhibits 34 and 35 of the Epiq Deposition] (filed under seal)
12	Watts Retention Agreement [Exhibit 5 of the Watts Deposition] (filed under seal)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 22, 2024.

/s/ Sunni P. Beville  
Sunni P. Beville